

MMP&S

MILBER MAKRIS PLOUSADIS & SEIDEN, LLP

ATTORNEYS AT LAW

1000 Woodbury Road Suite 402 Woodbury, NY 11797
Telephone: 516.712.4000 Fax: 516.712.4013
www.milbermakris.com

August 30, 2024

VIA ECF and

E-mail: chambersnysdseibel@nysd.uscourts.gov

Hon. Cathy Seibel
United States Courthouse for the Southern District of New York
300 Quarropas Street, Courtroom 621
White Plains, New York 10601-4150

Re: *Wayne Ballard v. The County of Rockland, Hon. Thomas E. Walsh II, et al.*
Docket No.: 7:24-CV-02944 (CS)

Dear Judge Seibel:

This firm represents Defendant, County of Rockland (“the County”) in the above-referenced action. This letter is submitted with the consent of all parties and in accordance with Your Honor’s Individual Practice Rule, seeking a second adjournment of the deadline to file Defendant, County of Rockland’s Motions to Dismiss, until October 1, 2024, with Plaintiff’s Opposition due November 18, 2024, Reply due December 2, 2024 and the Return Date December 3, 2024. The current deadline for the motions is on September 11, 2024.

The basis for the request is due to scheduling conflicts, August vacations and a personal matter regarding co-defendant’s counsel. All parties have consented and agree to bundling of motions.

In addition, as you know there is a companion case, Canario v. The County of Rockland et al, Docket Number 7:24-cv-04470, before Judge Kenneth Karas.

Please advise if the Court needs any further information. The Court’s attention to this matter is greatly appreciated.

Respectfully submitted,



Stuart P. Besen

SPB/aak

cc: **VIA ECF**
Evan Brustein, Esq. evan@brusteinlaw.com

WOODBURY, NEW YORK ■ PURCHASE, NEW YORK

NEW JERSEY ■ CONNECTICUT ■ FLORIDA ■ PENNSYLVANIA

Page 2

Robert B. Weissman, Esq.- rweissman@skdwmlaw.com